

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

RON E. HARRISON,

Defendant.

Case No.: 96-CR215

Filed: [10/31/96]

Violations: 18 U.S.C. §
371

Judge: Randa

INFORMATION

COUNT ONE - CONSPIRACY

The United States of America, acting through its attorneys,
charges:

I.

DESCRIPTION OF THE OFFENSE

1. Ron E. Harrison is hereby made a defendant on the
charge stated below.

2. Beginning at least as early as October 31, 1994, and
continuing until or about October, 1995, the exact dates being
unknown to the United States, in the Eastern District of
Wisconsin and elsewhere, the defendant and a co-conspirator did
unlawfully, willfully, and knowingly conspire, combine, and agree
to commit wire fraud by depriving Miller Brewing Company, Inc.
("Miller") of the honest services of an employee, in violation of
Title 18, United States Code, Sections 1343 and 1346.

3. As an object of the conspiracy and a part of the scheme to defraud, the defendant sought to receive and received approximately \$33,000 from the co-conspirator based on the defendant's position as manager of corporate purchasing at Miller. The defendant was involved in the purchase for Miller of point-of-purchase displays, such as plastic or neon bar taps, clocks, inflatables, lamps, lights, or signs from point-of-purchase display suppliers. During the period covered by this Information, the co-conspirator was an executive at a point-of-purchase display supplier and Miller was one of the co-conspirator's largest accounts.

4. On October 31, 1994, the defendant requested that the co-conspirator, having no pre-existing financial obligation to the defendant, pay the defendant \$33,000 to cover a personal debt purportedly owed by the defendant. At the time the request was made, the defendant knew that the stated purpose for the request was false.

5. On that date, the defendant and the co-conspirator agreed that the co-conspirator would pay the defendant the money, in cash, over a one-year period to avoid detection by the co-conspirator's business associates.

6. At the time the agreement was made, both the defendant and the co-conspirator knew that the request by and the payment of money to the defendant violated Miller's policy prohibiting such requests and payments.

7. Over the next year, the defendant received three payments from the co-conspirator totaling approximately \$33,000. The defendant received the first such payment of \$12,000 in November, 1994, at Miller's headquarters in Milwaukee, Wisconsin.

8. The defendant and co-conspirator concealed the scheme to defraud Miller throughout the period covered by this Information.

II.

USE OF WIRES

9. As part of the conspiracy, and for the purpose of executing and attempting to execute the scheme to defraud, the defendant and his co-conspirator did knowingly cause certain sounds to be transmitted in interstate commerce by means of wire communications, in violation of Title 18, United States Code, Sections 1343 and 1346.

III.

OVERT ACT

10. The defendant and his co-conspirator caused to be committed and committed at least one overt act in furtherance of the conspiracy, including in or around November, 1994, the defendant's co-conspirator traveled in interstate commerce to Miller's headquarters in Milwaukee for the purpose of paying the defendant \$12,000 as part of the scheme to defraud Miller of its rights to the defendant's honest services.

IV.

JURISDICTION AND VENUE

11. The conspiracy charged in this Information was formed and carried out, in part, in the Eastern District of Wisconsin within the five years preceding the filing of this Information. ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 371.

COUNT TWO - CONSPIRACY

12. The United States of America, acting through its attorneys, further charges:

13. Each and every allegation contained in paragraphs 1, 8, 9, and 11 are here realleged with the same full force and effect as though said paragraphs were set forth in full detail.

I.

DESCRIPTION OF THE OFFENSE

14. Beginning at least as early as January, 1996, and continuing until or about July, 1996, the exact dates being unknown to the United States, in the Eastern District of Wisconsin and elsewhere, the defendant and a co-conspirator did unlawfully, willfully, and knowingly conspire, combine, and agree to commit wire fraud by depriving Miller Brewing Company, Inc. ("Miller") of the honest services of an employee, in violation of Title 18, United States Code, Sections 1343 and 1346.

15. As an object of the conspiracy and a part of the scheme to defraud, the defendant sought to receive and received approximately \$16,000 from the co-conspirator based on the defendant's position as manager of corporate purchasing at

Miller. The defendant was involved in the purchase for Miller of point-of-purchase displays, such as plastic or neon bar taps, clocks, inflatables, lamps, lights, or signs from point-of-purchase display suppliers. During the period covered by this Information, the co-conspirator was an executive at a point-of-purchase display supplier and Miller was one of the co-conspirator's largest accounts.

16. In or about January, 1996, the defendant requested that the co-conspirator, having no pre-existing financial obligation to the defendant, pay the defendant \$16,000 to cover a personal debt purportedly owed by the defendant. At the time the request was made, the defendant knew that the stated purpose for the request was false.

17. In or about January, 1996, the defendant and the co-conspirator agreed that the co-conspirator would pay the defendant the money in a way to avoid detection by the co-conspirator's business associates.

18. At the time the agreement was made, both the defendant and the co-conspirator knew that the request by and the payment of money to the defendant violated Miller's policy prohibiting such requests and payments.

19. The defendant received \$16,000 from the co-conspirator. The defendant received the money at Miller's headquarters in Milwaukee, Wisconsin.

II.

OVERT ACT

20. The defendant and his co-conspirator caused to be committed and committed at least one overt act in furtherance of the conspiracy, including in or around January, 1996, the defendant's co-conspirator traveled in interstate commerce to Miller's headquarters in Milwaukee for the purpose of paying the defendant the requested money as part of the scheme to defraud Miller of its rights to the defendant's honest services.

ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 371.

Dated:

_____/s/_____
A. Douglas Melamed
Acting Assistant Attorney General

_____/s/_____
James H. Mutchnik

_____/S/_____
_____/S/_____
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_____/s/_____
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Assistant Chief
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_____/s/_____
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